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Comment on proposed R 15-300

1. The regulation is objectionable because of lack of clarity in its phrasing, apparent lack of necessity, and because it tries to cover two problems which, although they may be related, are separate and distinct. The regulation is titled "Medical Support Training." Paragraph 1 refers to medical support of training. Paragraph 1 is also objectionable in that it is either lacking in precision or duplicates the statement of the functions of the Medical Staff already appearing in R 1-140.

2. Insofar as the regulation concerns medical support of training, the training function, like other Agency functions, is already entitled to needed support under the provision of R 1-140, in particular, paragraph 6.b.(3). So far as medical support training is concerned, paragraph 6.b.(8) of R 1-140 provides for the same, and the currently proposed regulation seems to add nothing to that statement.

3. Paragraphs 6.b.(2), (4), and (6) of R 1-140 seems to accomplish all the purposes sought to be accomplished by paragraphs 2.a.(3) and (4) and 2.b. Paragraph 2.a.(1) has no clear meaning.

4. Since, as indicated above, the proposed regulation seems merely repetitive of the corresponding provisions of R 1-140, we question its utility. Should R 1-140 be presently unsatisfactory, we suggest that it be amended in preference to the issuance of a separate regulation attempting to ameliorate each of the subordinate points therein.